

Approved:   
EMILY DEININGER  
Assistant United States Attorney

Before: HONORABLE LISA MARGARET SMITH  
United States Magistrate Judge  
Southern District of New York

- - - - - X  
UNITED STATES OF AMERICA : COMPLAINT 18 mag 10066  
- v. - : Violations of  
ANTONIO SANTIAGO, : 21 U.S.C. §§ 371, 2312, and  
Defendant. : 2313  
COUNTY OF OFFENSE:  
WESTCHESTER  
- - - - - X

SOUTHERN DISTRICT OF NEW YORK, ss.:

KEVIN M. GONYO, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

1. From in or about October 2017 through in or about November 2018, in the Southern District of New York and elsewhere, ANTONIO SANTIAGO, the defendant, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to transport and sell stolen vehicles, in violation of Title 18, United States Code, Sections 2312 and 2313.

2. It was a part and an object of the conspiracy that ANTONIO SANTIAGO, the defendant, and others known and unknown, would and did unlawfully transport in interstate commerce stolen motor vehicles, knowing the same to be stolen, in violation of Title 18, United States Code, Sections 2312.

3. It was a part and an object of the conspiracy that ANTONIO SANTIAGO, the defendant, and others known and unknown, would and did receive, possess, conceal, store, barter, sell, and dispose of stolen motor vehicles, which had crossed a State or

United States boundary after being stolen, in interstate commerce, knowing the same to be stolen, in violation of Title 18, United States Code, Section 2313.

OVERT ACTS

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York:

a. On or about September 12, 2018, ANTONIO SANTIAGO, the defendant, participated in a phone call with Marvin Williams, a co-conspirator, in which they discussed Williams purchasing a stolen vehicle from SANTIAGO.

b. On or about September 20, 2018, SANTIAGO participated in another phone call with Williams, in which they discussed Williams purchasing two stolen Land Rover Range Rovers from Santiago.

(Title 18, United States Code, Section 371)

The bases for my knowledge and the foregoing charges are, in part, as follows:

5. I am a Special Agent with the FBI, and I have been personally involved in the investigation of this matter. This affidavit is based upon that experience, my examination of reports and records, and my conversations with other law enforcement agents and other individuals. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

BACKGROUND

6. Beginning in or about March 2018, the New York State Police ("NYSP") began investigating a multi-state scheme involving the transportation and sale of stolen vehicles. Since, in or about May 2018, the NYSP has been jointly conducting that investigation with the FBI.

7. As part of that investigation, from on or about September 4, 2018 through on or about September 28, 2018, other

law enforcement officers and I intercepted telephone calls and text messages over a phone used by Marvin Williams, a co-conspirator, pursuant to a court-authorized wiretap (the "Williams Wiretap"). The investigation also included and yielded, among other things, physical surveillance, cell site data, interviews of victims, and records of online advertisements and transactions.

8. On or about November 6, 2018, this Court signed a complaint charging co-conspirators Marvin Williams, Nicholas Dixon, a/k/a "Robbie," Jason Higney, and four other defendants, with transportation and sale of stolen vehicles and conspiracy to do the same, in violation of Title 18, United States Code, Sections 371, 2312, and 2313. Arrest warrants were also issued, and, Williams, Dixon, and Higney, amongst others, were arrested on or about November 8, 2018.

9. As set forth below, there is probable cause to believe that ANTONIO SANTIAGO, the defendant, and others known and unknown, conspired with Williams, Dixon, Higney, and others known and unknown to operate a stolen car ring, during which they obtained stolen vehicles from, among other places, Florida, and transported the stolen vehicles to, among other places, the Southern District of New York and Connecticut, for resale.

10. In particular, based on my review of review of conversations intercepted over the Williams Wiretap, I believe that there is probable cause to believe that ANTONIO SANTIAGO, the defendant, supplies stolen vehicles obtained in Florida to Marvin Williams for transportation to and resale in other locations, including the Southern District of New York and Connecticut.

11. The investigation to date has revealed that by this criminal scheme ANTONIO SANTIAGO, the defendant, and others known and unknown have obtained, transported, and sold or attempted to sell approximately sixty vehicles worth, in total, approximately \$3,100,000.

**I. 2018: ANTONIO SANTIAGO, the Defendant, Sells Stolen Vehicles to Marvin Williams**

12. On or about September 12, 2018, several communications were intercepted between ANTONIO SANTIAGO, the defendant, using a call number ending in 0705 (the "Santiago Phone"),<sup>1</sup> and Marvin Williams on the Williams Wiretap.

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<sup>1</sup> I believe the Santiago Phone is used by ANTONIO SANTIAGO, the defendant, because, among other things, I have reviewed an FBI surveillance report

a. During the first call, Williams told SANTIAGO, among other things, that he was "the main connect" and that while he and SANTIAGO had been "doing business through another guy" to "buy[] all of that shit . . . like for example, the Range Rover," he wanted SANTIAGO to "deal me directly [because] we could make money together." Williams further explained that "[a]ll I need to know is yo, if the thing is hot or not . . . so I can tell him, yo put that in a certain spot, drive cautiously."

b. Later that same day, during another intercepted call, Williams asked SANTIAGO if "the disconnect gonna be done for today or tomorrow," and SANTIAGO responded that "they waiting on me, I'm headed there now." Williams then agreed that "my guy that you're going to meet up with" could be ready "[i]n about an hour" because Williams was going to "send the cash on to him directly right now then." SANTIAGO stated that it would be "eight."

13. Shortly thereafter, several communications were intercepted over the Williams Wiretap between Marvin Williams and Nicholas Dixon, a/k/a "Robbie."<sup>2</sup>

a. During one call, Williams told Dixon that he was "good to go" and that he should "give him 8 thousand."

b. During a subsequent call, Dixon told Williams that "he call me he is ready to link with me now."

c. Later that afternoon, Williams texted Dixon and wrote that he should "keep her parked up backwards until I get

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from which I have learned that, on or about October 15, 2018, a FBI Special Agent ("SA-1") observed SANTIAGO, who he recognized photograph on file with the State of Florida Department of Motor Vehicles for SANTIAGO, enter and conduct business at an auto tag agency (the "Agency"). An employee of the Agency subsequently informed SA-1 that SANTIAGO had provided the Agency with a copy of a Florida driver's license identifying himself as "Antonio Andre Santiago Jr.," and that SANTIAGO had provided the Agency with the Santiago Phone as his contact number.

<sup>2</sup> I believe that Nicholas Dixon uses the call number that was in communication with Marvin Williams because, on or about September 21, 2018, Dixon was arrested by the Broward County Sheriff's Office in Florida for possession of two stolen vehicles. DIXON had that phone in his possession at the time of his arrest and acknowledged that it was his.

you a plate."

## **II. Late September 2018: A Stolen Corvette**

14. I have reviewed a call intercepted between Marvin Williams and Nicholas Dixon, a/k/a "Robbie," on or about September 17, 2018, in which Williams told Dixon, among other things, that he and ANTONIO SANTIAGO, the defendant, were "supposed to come to a price on the vette."

15. The next day, a call was intercepted between ANTONIO SANTIAGO, the defendant, and Marvin Williams over the Williams Wiretap. During that call, SANTIAGO and Williams discussed Williams purchasing additional vehicles from SANTIAGO, including a "vette" that had a "plate [that] was already out dated."

16. On or about September 18, 2018, a call between Marvin Williams and Nicholas Dixon, was intercepted over the Williams Wiretap in which Dixon told Williams, in substance and in part, that he had picked up the "vette" from ANTONIO SANTIAGO, the defendant, and that it drove differently because "it's a stick shift."

17. Based on my review of an incident report from the Broward County Sheriff's Office ("BCSO") and conversations with a BCSO officer, I know that, three days later, Nicholas Dixon, a/k/a "Robbie," was arrested in possession of a stick shift Chevrolet Corvette, VIN ending 0392, which had been reported stolen out of Boca Raton, Florida.

## **III. Late September 2018: Two Stolen Range Rovers**

18. Based on my review of incident reports from the Sunrise Police Department and the Orlando Police Department, I know that, in or about September 2018, two Range Rovers, VINS ending 7428 and 8398, respectively ("Range Rover-1" and "Range Rover-2") were stolen out of Davie, Florida and Orlando, Florida, respectively.

19. On or about September 20, 2018, several communications were intercepted between ANTONIO SANTIAGO, the defendant, and Marvin Williams.

a. In one call, Williams asked SANTIAGO if a vehicle was "heated currently." SANTIAGO responded, among other things, that "I'm sure it is" and that "it probably came from a

rental place." Williams then told SANTIAGO that his "boys are flying in tonight" to "pick it up" and that they would also "gonna be driving the other one that you got for me."

b. Approximately 25 minutes later, in another call, Williams asked SANTIAGO whether "they did the disconnect on that already," and SANTIAGO responded, "[y]eah everything's done they do their own."

20. I have reviewed a call intercepted that same day over the Williams Wiretap between Marvin Williams and Jason Higney in which Williams told Higney, among other things, that "it's two Range Rovers so you'll drive back one."

21. Based on my conversations with other FBI Special Agents, and my review of surveillance reports prepared by those agents, I know the following:

a. On or about September 20, 2018, FBI Special Agents conducting physical surveillance observed Jason Higney and another male ("UM-1") arrive at the Fort Lauderdale-Hollywood International Airport, where they were picked up by Nicholas Dixon, a/k/a "Robbie."

b. Dixon drove Higney and UM-1 to the parking lot of an apartment complex located in Tamarac, Florida, where Higney and UM-1 picked up two black Land Rover Range Rovers.

c. During further surveillance later that day, law enforcement agents were able to observe the dashboard VINs on both vehicles, and identified them as Range Rover-1 and Range Rover-2.

22. I have reviewed location data from a phone used by Jason Higney (the "Higney Phone"),<sup>3</sup> which shows that it travelled north from Florida towards New York on or about September 20 and 21, 2018. On or about September 22, 2018, the Higney Phone entered

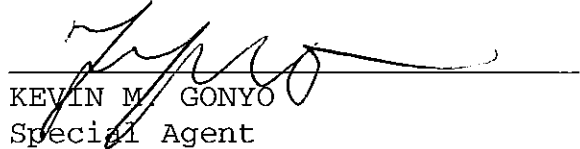
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<sup>3</sup> I believe that Jason Higney uses the Higney Phone because, among other things, the call number is subscribed to "Jason Higney" at a residence in Terryville, Connecticut, and because Higney was observed meeting with Marvin Williams on or about September 22, 2018, and was recognized based on the photograph on the Connecticut driver's license for Higney, after that meeting was arranged in conversations and text messages intercepted over the Williams Wiretap. Cell site data for the Higney Phone was obtained pursuant to a Warrant and Order issued on September 20, 2018 by the Honorable Lisa Margaret Smith, United States Magistrate Judge, Southern District of New York.

the State of New York, and was in the vicinity of Mount Vernon at approximately 8:58 a.m., before moving north and reaching the vicinity of Danbury, Connecticut at approximately 9:43 a.m.

23. Based on my review of a surveillance report prepared by a NYSP Investigator, I know that, on or about September 22, 2018, NYSP Investigators conducting physical surveillance of Jason Higney in the vicinity of Interstate 84, at approximately 10:45 a.m., observed Higney operating Range Rover-1. Higney drove Range Rover-1 to a parking lot in Waterbury, Connecticut, where he parked it next to Range Rover-2. Higney was then observed meeting with Marvin Williams, who thereafter drove Range Rover-2 out of the parking lot.

WHEREFORE, deponent prays that ANTONIO SANTIAGO, the defendant, be arrested, imprisoned, or bailed, as the case may be.

  
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KEVIN M. GONYO  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
28<sup>th</sup> day of November, 2018

  
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HONORABLE LISA MARGARET SMITH  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK